

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S SWORN STATEMENT

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I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

Further, I hereby attest that the attached exhibits are accurate and true copies of source documents as described. Video and telephone recording transcripts may contain typos due to voice to text transcription software. True and accurate copies of original video and audio recordings can be provided should it please the court.

Signed this 26 day of June 2019

Defendant, Pro Se Jason Goodman

Jason Goodman, Pro Se
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DEFENDANT'S SWORN STATEMENT - 1

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DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION FOR RULE 11
SANCTIONS

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

Comes now, Defendant Goodman, Pro Se, with this response to Plaintiff's motion for Rule 11 sanctions. The irony of Plaintiff calling for sanctions is laughable. Defendant has made every effort to answer the ridiculous, overblown and unfounded claims of Plaintiff in a concise and professional manner, introducing to the record ONLY facts, evidence and true information in support of his defense. Defendant would like this matter to be closed without further misuse of the time and resources of this honorable court and has made every effort to do that. Plaintiff's instant legal action is a fundamental fraud built on false, baseless and inaccurate claims that are unsupported by evidence, have no basis in law or fact and fail to state a claim for which relief can be granted. Defendant stands by his statements regarding Plaintiff and still believes them to be true and correct and supported by real evidence. In direct response to Plaintiff's motion, the only fools involved in this matter are the Plaintiff, his attorney, Intervenor Applicant and their band of co-conspirators, more of which have come forward admitting that the alleged conspiracy DOES in fact exist. Additional evidence of this conspiracy will be presented in this pleading.

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 1

FACTUAL BACKGROUND

1. According the Merriam-Webster.com the historic, clinical definition of an “idiot” is someone whose “mental development never exceeds that of a normal child”. To describe a public figure as an idiot is a clearly understood matter of opinion and although it may hurt Plaintiff’s feelings, this and similar statements are protected first amendment speech.
2. Plaintiff has publicly stated, without supportive evidence, that *“we actually believe that there is a colony on Mars that is populated by children who were kidnapped and sent into space on a 20 year ride. So that once they get to Mars, they have no alternative but to be slaves on the Mars colony.”* This has been previously cited as evidence in this legal matter and reprinted in newspapers and websites around the country. While this might be a statement one could expect a normal, as yet uneducated, or otherwise fanciful child to make, it is not something we would reasonably expect a well-adjusted adult to say, particularly not in a public forum on a broadcast to millions. It remains Defendant’s belief that only a person with no ability to differentiate fact from fantasy, possibly someone with severe mental illness or otherwise defined as a real idiot would make such a statement.
3. Plaintiff and his demonstrably unscrupulous attorney have acted in a pattern and practice which relies on intimidation, threats and initiation of legal action as a method of attack and / or to achieve political goals rather than actually seeking relief for real damages. In a video interview with social media personality David Seaman, Plaintiff Steele clearly articulates this intention (<https://vimeo.com/335290980>) stating *“We are going to take down YouTube and Google and Facebook and Twitter and Amazon and Wikipedia and Meetup and then they are all going to pay millions and millions and millions of dollars*

1 *because I am going to personally do my very best to inspire with a legal summit ten*
2 *thousand lawsuits...*” Plaintiff has been doing his best to make good on his promise to
3 waste public legal resources fighting his own political battles. His attorney, Steven S
4 Biss now represents Congressman Devin Nunes in a series of lawsuits that have been
5 universally derided as baseless attacks on journalism and the first amendment and almost
6 certain to fail on their lack of merits. Biss employs the same overreaching tactics in
7 demanding years of tax returns and other unnecessary documents via discovery which
8 seem clearly intended to reveal personal information about opponents to be used against
9 them, rather than actually seeking relief for a legitimate claim or information directly
10 related to disputed claims in a given action.
11

12
13 (<https://www.fresnobee.com/news/local/article231932983.html>)

- 14 4. Counsel for Plaintiff is in a regular practice of attempting to overwhelm legal opponents
15 with inappropriate legal action and huge unfounded financial demands for claimed
16 damages. It is Defendant’s belief that this method is intended to intimidate opponents
17 and frighten them into submission, very likely through arbitrated settlement or to
18 otherwise break the financial back of an opponent by forcing them to retain counsel, also
19 ultimately resulting in a settlement. Defendant has thwarted this by responding pro se and
20 now it seemingly appears the often-censured attorney Biss seeks to confound the
21 Defendant with elements of legal process and by failing to adhere to the most significant
22 rules of procedure, most recently in his improper scheduling of 26f conference. Biss sent
23 a confirmation email to jasongoodman72@protonmail.com. This is NOT an email
24 address provided by Defendant. This is NOT Defendant’s email address of record with
25 regard to this or any other matter. This is NOT an email address Defendant has ever
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1 communicated with Biss through. This is NOT an email address Defendant has access to.
2 When no response was received to Biss' request for confirmation, no further attempts
3 were made to confirm the scheduled time with Goodman. Biss proceeded in bad faith,
4 knowing Goodman had never specifically said he would be available on the date and time
5 requested, and Goodman was in fact, not available to confer at the inappropriately
6 scheduled time. It is Defendant's belief that this was done purposefully in an attempt to
7 "get ahead" of Defendant with time consuming legal process which might overwhelm
8 and deadlines which Biss may have hoped Goodman would miss, resulting in default or
9 some other advantage for Plaintiff.
10
11

12 5. Biss was sanctioned by a three judge panel of the circuit court on November 20, 2008 for
13 his role in a "corporate and securities matter, in which he violated professional rules that
14 govern competence, scope of representation, and misconduct that involves
15 **DELIBERATELY WRONGFUL ACTS** [emphasis added] that reflect adversely on his
16 fitness to practice." This is a stern censure and speaks directly to attorney Biss' conduct
17 in this instant legal matter. Defendant directly questions Biss' fitness to practice law or
18 even abide by it.
19

20 6. During the one year and one-month period of suspension resulting from the above
21 referenced matter, Biss again totally disregarded the law, the orders of the court and any
22 semblance of ethics by continuing "to negotiate with an insurance company on behalf of
23 a client in a personal injury matter." For this violation, Biss was sanctioned for another
24 30 days, and again the court found this to be "misconduct that reflects adversely on the
25 lawyer's fitness to practice"
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- 1 7. On October 18, 2010, the Virginia State Bar Disciplinary Board issued a public
2 reprimand to Biss for violating a professional rule that governs conflict of interest
3 involving a former client. This was an agreed disposition of misconduct charges.
4
- 5 8. On July 24, 2017 in a matter brought by the New York State Department of
6 Environmental Conservation, Steven Scott Biss and his corporation BissCo were found to
7 have committed violations of Articles 17 and 27 of the Environmental Conservation Law
8 of the State of New York and Title 6 of the Official Compilation of Codes, Rules and
9 Regulations of the State of New York (6 NYCRR) Parts 360, 372, 374, 612, 613, and
10 614. A civil penalty of one hundred twenty-two thousand two hundred fifty dollars
11 (\$122,250) was assessed against Biss and BissCo jointly and severally. These actions
12 speak collectively to the integrity, demeanor and general conduct of Steven Scott Biss,
13 both as an unfit to practice attorney and an immoral person. They illustrate an individual
14 who is willing to do whatever he chooses and whatever is necessary to achieve his
15 desired outcome, irrespective of the law, the public health, the truth, facts or ethics. He
16 has demonstrated a pattern and practice of deceptive, shameful actions characterized by
17 dishonesty throughout his career that according to court rulings, call his fitness to practice
18 law into question. It is Defendant's hope that this honorable court will keep these
19 important facts in mind when considering the false and outrageous claims of Plaintiff and
20 his totally out of control counsel.
21
- 22 9. Throughout the course of Plaintiff's solicitation of \$250,000 (two hundred fifty thousand
23 dollars) in charitable contributions to his 501(c)(3) tax exempt corporation, and even to
24 this very day, Plaintiff claims to have written the NATO Open Source Intelligence
25 Handbook despite adamant, credible claims to the contrary. The retired Four-Star U.S.
26 27 28

1 Army General who was in charge of the NATO Southern Atlantic Command at the time
2 of the book's publication has declared Plaintiff's claim "ridiculous" and false. In a
3 telephone interview published on May 1, 2019, Kernan states with no equivocation,
4 Plaintiff's claim of authorship is ridiculous. **(EXHIBIT A)** Defendant has no reason to
5 doubt the General's testimony and many to doubt Plaintiff's. Defendant remains
6 confident in his statement that Plaintiff's claims of writing the Open Source Intelligence
7 Handbook are false, or at least materially misleading. Using such a false claim to entice
8 the public to donate to a 501(c)(3) tax exempt corporation is of course charity fraud.
9

10 10. Throughout the course of his solicitation of \$250,000 (two hundred fifty thousand
11 dollars) in charitable contributions to his 501(c)(3) tax exempt corporation, Plaintiff
12 claimed to have been "nominated" for a Nobel Peace Prize. The only supportive
13 evidence to substantiate this claim is a PDF document authored by Plaintiff himself,
14 posted to his own web site ([https://robertdavidsteele.com/wp-](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf)
15 [content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf)
16 [David-Steele.pdf](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf)). Plaintiff has even suggested during this legal proceeding that
17 Defendant should have KNOWN Defendant's own statements to be false, because
18 according to Plaintiff the true facts are contained in this document on Plaintiff's website.
19 Even a cursory examination of the document's properties **(EXHIBIT B)** reveals the
20 "nomination" was in fact written by Plaintiff himself using a nine-year-old version of
21 Microsoft Word and an equally antiquated revision of Adobe Acrobat. Since the start of
22 this legal action, and Defendant's vehement public proclamations of Plaintiff's extensive
23 fraud, Plaintiff has taken to revising his language on this particular talking point,
24 referring to it as a "recommendation" for the Nobel prize nomination rather than an actual
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1 nomination. This change was made AFTER nearly \$10,000 was contributed to Plaintiff's
2 501(c)(3) by members of Defendant's viewing audience and after doubts with regard to
3 the veracity of the initial claim were raised in regard to this lawsuit. It is Defendant's
4 belief that Plaintiff has made this revision because Plaintiff is fully aware that falsifying
5 his credentials or falsely embellishing his resumé to entice charitable donations IS
6 CHARITY FRAUD. No actual evidence of a Nobel Peace Prize nomination has been
7 shown and none exists to the best of Defendant's knowledge. Defendant stands by his
8 statements that Plaintiff is both an idiot and a fraud.
9

10
11 11. During a YouTube broadcast that has since been removed from the internet, Plaintiff has
12 publicly declared that discovery in this instant legal action has informed him that
13 Defendant is paid by Israeli Mossad, this is categorically false. The improperly
14 scheduled 26f conference did not take place until May 2019, and no documentation has
15 been produced as yet. Plaintiff's comments were made months prior to May 2019 and
16 Defendant has never received any funding or any payments whatsoever from Israeli
17 Mossad or any related entities to the best of Defendant's knowledge. This is one of the
18 key themes propagated by various members of the conspiracy to defame Defendant.
19

20 12. As previously submitted in these proceedings, (ECF No. 78 EXHIBIT I) Intervenor
21 Application D. George Sweigert, telephone Manuel Chavez III, making substantially the
22 same claim, falsely stating that Defendant Goodman was paid by Black Cube
23 (<http://www.blackcube.com>) a private intelligence firm in the UK comprised of former
24 Mossad agents and operatives, according to their own public website.
25

26 13. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal
27 emails with Defendant. Among these were messages Chavez claims are communications
28

1 from Thomas Shoenberger, an individual unknown to Defendant who may in fact be
2 highly placed in the organization of the monetized conspiracy to harass and defame
3 Defendant Goodman. The emails from Shoenberger provide talking points for a plan to
4 attack Defendant Goodman's reputation with false allegations claiming Goodman is an
5 agent of Israel and / or paid by Mossad.
6

7 14. Additionally, Chavez provided communications between Plaintiff, Chavez, Thomas
8 Shoenberger and Tanya Cornwell the wife of counsel for Plaintiff, Steven Biss.

9 **(EXHIBIT C)** This email provides evidence that counsel for Plaintiff Biss is using his
10 wife as a "cutout" or conduit through which he can indirectly communicate with the co-
11 conspirators and still provide the plausible claim that "I haven't spoken with (fill in the
12 name)". This email provides substantial evidence of the conspiracy alleged by
13 Defendant. A transcript of a publicly broadcast multiparty phone conversation between
14 Simpsons, Chavez, Intervenor Applicant and others has been submitted as evidence
15 previously in this matter (ECF No. 78 EXHIBIT A).
16
17

18 15. Chavez provided an email between Plaintiff and Chavez in which Plaintiff admits he is in
19 direct contact with alleged co-conspirator Tyroan Simpson, **(EXHIBIT D)** and seeks
20 approval from Biss' wife Tanya for communicating with Simpson against Biss'
21 instructions. It would seem Biss had advised Steele not to communicate with Simpson in
22 an effort to hide their collaboration and provide further evidence of conspiracy.
23

24 16. In the rule 11 motion, Plaintiff has expressed incredulity at the fact that the mere filing of
25 this legal action, in absence of a judgment, has not stopped Goodman from producing
26 broadcasts that address Plaintiff's abuse of the legal system, Plaintiff's multiple frauds on
27 the public and Plaintiff's ongoing efforts to harass and intimidate Goodman, Goodman's
28

1 talk show guests and audience. Goodman continues to report and comment on the
2 activities of Plaintiff and his associates as they are matters of public interest.

3 17. Plaintiff's motion for rule 11 sanctions against Goodman has no basis in fact or law and
4 is yet another in a long series of intimidation tactics intended to distract Defendant from
5 investigative journalism, derail Defendant's reporting on alleged wrongdoing by Plaintiff
6 and otherwise result in gaining some advantage over Defendant with regard to this legal
7 action.
8

9 18. Goodman made statements regarding Biss' association with Congressman Devin Nunes
10 based on information and belief that those statements were true and correct. Goodman
11 remains consistent in that belief. A journalistic source close to Nunes told Goodman
12 directly that Biss was recommended to Nunes by Steele. Shortly after filing the suit
13 against Twitter, Nunes made an appearance on Fox News
14 (https://www.youtube.com/watch?v=U1_c860YIPc) in which he repeated Plaintiff's
15 talking points as articulated in the above referenced David Seaman interview, claiming
16 multiple lawsuits would be filed against Twitter, Google and others. Goodman's claim
17 was made in good faith, and Goodman believes to this day that Plaintiff either directly or
18 indirectly recommended Biss to Nunes or otherwise played some role in connecting the
19 two parties and / or has influence over Nunes' suit via interaction with Biss. Intervenor
20 Applicant has made numerous public calls in now deleted YouTube broadcasts for
21 Congress to open an investigation into the incidents at the Port of Charleston on June 14,
22 2017, despite the FBI's completion of a full investigation. Intervenor Applicant has also
23 publicly proclaimed Devin Nunes will now be somehow compelled to act in response to
24 this instant legal matter. Furthermore, the Nunes/Biss Twitter lawsuit has been
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1 universally derided by legal experts on both sides of the political fence for numerous
2 shortcomings, improprieties and obvious legal missteps. Both Twitter and the one non-
3 fictional co-defendant have pointed out that filing in VA state court represents possible
4 venue shopping and / or publicity efforts but is not the appropriate venue given Nunes
5 California residency, Twitter's primary business location and a stipulation in the Twitter
6 EULA that all civil matters are to be adjudicated in California. These substantial
7 deficiencies aside, legal experts consider the action virtually guaranteed to fail given
8 Twitter and all social media networks are currently protected by CDA 230 and suits of
9 this nature have not succeeded since the Digital Millennium Copyright Act came into
10 being in the late 1990s. Any legitimate lawyer with an honest claim should be aware of
11 this, as should any competent member of Congress. A more sensible approach would be
12 to advise a sitting Congressman to introduce legislation to address shortcomings in the
13 arguably obcelete statute as Senator Josh Hawley has done, just this past week.
14 ([https://www.hawley.senate.gov/senator-hawley-introduces-legislation-amend-section-](https://www.hawley.senate.gov/senator-hawley-introduces-legislation-amend-section-230-immunity-big-tech-companies)
15 [230-immunity-big-tech-companies](https://www.hawley.senate.gov/senator-hawley-introduces-legislation-amend-section-230-immunity-big-tech-companies)) Based on these facts it is Defendant's belief that
16 Counsel for Plaintiff has an ulterior motive in representing Mr. Nunes, possibly as simple
17 and bilking the a potentially gullible representative for money and / or publicity. It
18 should also be noted that the Nunes/Biss suit against Twitter contains allegations against
19 journalists who have authored unfavorable news items about representative Nunes and
20 has already been amended to eliminate the false claim that specific words in a journalist's
21 tweet where highlighted in bold type. In a recent Fox News interview,
22 ([https://www.techdirt.com/articles/20190411/15061441985/devin-nunes-admits-that-his-](https://www.techdirt.com/articles/20190411/15061441985/devin-nunes-admits-that-his-bogus-defamation-lawsuits-are-really-about-phishing-journalists-sources.shtml)
23 [bogus-defamation-lawsuits-are-really-about-phishing-journalists-sources.shtml](https://www.techdirt.com/articles/20190411/15061441985/devin-nunes-admits-that-his-bogus-defamation-lawsuits-are-really-about-phishing-journalists-sources.shtml)) Mr.
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1 Nunes states “I am absolutely sure that they do not want this to get to discovery so that
2 we find out who their sources are.” This statement echoes the underhanded tactics
3 practiced by Plaintiff and his “unfit to practice” attorney. They have demonstrated a
4 pattern and practice of threatening adversaries with discovery and then seeking
5 outrageous overreaching document production in that process. They wield civil legal
6 measures like a weapon and have frequently spoken about using it to get personal,
7 sensitive or otherwise protected information from individuals who they perceive as
8 adversaries. Plaintiff and his attorney falsely believe they can use the discovery process
9 in a fraudulent civil legal matter to pierce the armor of the U.S. Constitution and
10 protection of journalistic sources and the American public’s right to a free press and
11 freedom of speech.
12
13

14 19. Plaintiff’s counsel Steven S. Biss is in the regular practice of flouting the law and
15 encouraging frivolous and vexatious punitive legal action against unfavorable journalists
16 in direct conflict with the first amendment right to free speech. This tactic was used
17 against Jake Morphonios, as revealed by Morphonios’ name appearing in the original
18 complaint filed in this matter. (ECF No. 1 page 32 paragraph 26). This error reveals Biss’
19 cut and paste approach to bringing vexatious and frivolous suits against journalists or
20 those seeking to do legitimate investigation into the activities of the clients he represents.
21
22

23 20. Another email provided by Manuel Chavez III reveals not only that Biss’ wife Tanya
24 Cornwell, was actively encouraging Chavez to bring suit against Goodman (in lieu of
25 Steele doing so) she is in fact the actual author of the Morphonios lawsuit, and therefore,
26 conceivably at least partly due credit for authoring the original complaint in this instant
27 legal action. **(EXHIBIT E)** In this email Cornwell goes as far as stating “I’m guessing a
28

1 half a million bucks they will throw at you to just make it go away” clearly stating the
2 intention and expectations of Plaintiff’s legal team at the outset of this matter.

3 21. In a video posted to YouTube on June 23, 2019, Manuel Chavez III revealed that a user
4 with the handle AMABISS had provided him with payments totaling one thousand five
5 hundred dollars (\$1,500) via Patreon on August 1, 2017 at the exact time frame the
6 events detailed in this legal matter were taking place. **(EXHIBIT F)** Chavez has
7 confirmed that username AMABISS is Tanya Cornwell, wife of counsel for Plaintiff
8 Steven S. Biss.
9

10 22. Plaintiff Steele has directly and publicly interacted with George Webb Sweigert, brother
11 of Intervenor Applicant both on video
12 (<https://www.youtube.com/watch?v=hMJoAO5OZY8>) and via email as presented in ECF
13 No. 78 Exhibit O)
14

15 23. Plaintiff Steele has directly and publicly interacted with Manuel Chavez III on several
16 occasion including on videos still viewable on YouTube
17 (https://www.youtube.com/watch?v=Xtz_S0tH1g). Plaintiff has also privately
18 communicated with Chavez in a clandestine manner via email as revealed by Manuel
19 Chavez earlier this week.
20

21 24. Chavez is an associate of Intervenor Applicant and has been paid by Intervenor Applicant
22 and has received direct instructions from Intervenor Applicant. Intervenor Applicant
23 operates a YouTube channel under the account name “Prepper Kitty Intel PKI”. Many
24 exhibits in this instant legal matter have referenced this YouTube account. YouTube
25 username Prepper Kitty Intel has paid Chavez via YouTube Superchat **(EXHIBIT G)**
26
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1 25. Intervenor Applicant has directly and publicly interacted with George Webb Sweigert,
2 Manuel Chavez III, and Tyroan Simpson, evidence of these communications has been
3 provided previously in these pleadings.
4

5 26. According to pleadings and public statements by Intervenor Applicant he has interacted
6 with Susan Lutzke/Holmes privately in revealing the identity of O. Marshall Richards
7 and other matters.

8 27. According to statements by Susan Lutzke/Holmes she has interacted with Intervenor
9 Applicant privately in revealing the identity of O. Marshall Richards and other matters.
10 (<https://www.youtube.com/watch?v=WwyRPFhW-HE>)
11

12 28. Counsel for Plaintiff is in a regular practice of ignoring the law, lying to courts, clients,
13 legal adversaries and the public. In 2009, Counsel for Plaintiff had his legal license
14 suspended by the VA State Bar Association for one year. Despite this severe measure,
15 Biss continued to practice law in direct defiance of the order, earning an extended
16 suspension for the transgression. Despite this, Biss continued his unscrupulous and
17 unlawful activity. On July 24, 2017, it was determined that both Counsel for Plaintiff and
18 a corporation owned by Counsel, Bissco Holdings, Inc ("Bissco") had violated New York
19 State Environmental Conservation regulations. Multiple counts detailed Counsel's
20 improper disposal of hazardous toxic waste and demonstrated Counsel for Plaintiff's total
21 disregard for the law, the environment and the health and safety of the general public.
22 (<https://www.dec.ny.gov/hearings/110879.html>). The New York State Department of
23 Environmental Conservation was awarded default judgements against Steven S. Biss and
24 Bissco In the Matter of the Alleged Violations of Articles 17 and 27 of the Environmental
25 Conservation Law of the State of New York and Title 6 of the Official Compilation of
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1 Codes, Rules and Regulations of the State of New York (6 NYCRR) Parts 360, 372, 374,
2 612, 613, and 614. Biss was ordered to pay a civil penalty in the amount of one hundred
3 twenty-two thousand two hundred fifty dollars (\$122,250). (DEC Case No. R5-
4 20120627-2006)
5

6 29. Defendant Goodman has never been sanctioned, arrested, accused or charged of any
7 crimes or legal wrongdoing, prior to the allegations of Plaintiff.

8 30. In Plaintiff's Motion for rule 11 sanctions, Plaintiff claims to have never had any
9 communication with Intervenor Applicant, but then immediately contradicts this claim,
10 stating he has received email communications from Intervenor Applicant. The motion
11 goes on to describe counsel for Plaintiff responding to Intervenor Applicant making this
12 denial of communication and semantic maze to be navigated by anyone trying to
13 determine if there has or has not been communication between parties and / or
14 representatives or intermediaries. To clarify Defendant's claim, while it is clear the
15 alleged co-conspirators have gone out of their way to avoid direct communicaitons
16 between certain parties, there are common connections that allow indirect
17 communications which facilitate the alleged conspiracy and circumvent the capabilities
18 of civil legal matters.
19

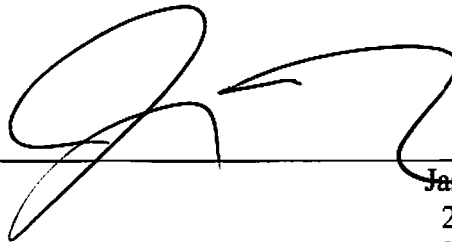
20
21 31. On July 7, 2017 Plaintiff sent an email communication to George Webb Sweigert, brother
22 of Intervenor Applicant, stating "A massive law suit is about to be filed against Jason
23 Goodman by a lawyer who specializes in defamation cases. Manny is the one who will
24 be in front" (**EXHIBIT H**) Manny is Manuel Chavez III, one of the individuals who was
25 on the multiparty video chat in which Sweigert agreed to a monetized harassment effort
26 targeting Defendant as presented here in previous pleadings. This email was sent just
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1 three weeks after Tanya Cornwell sent the above referenced email to Manuel Chavez III
2 encouraging him to sue Defendant Goodman. It is conceivable that Plaintiff intended to
3 use Chavez as a "cut out" to bring the same type of legal action against Defendant
4 Goodman, subjecting Goodman the the same legal jeopardy and assumed need to hire
5 counsel and subsequent financial ruin, without subjecting himself to the risk of fines for
6 legal fees or other sanctions. It now seems Chavez' sense of self-preservation prevented
7 him from complying with this plan and may have led to the break in the relationship, and
8 dissention in the ranks of the conspirators.
9

10 CONCLUSION

11
12 To the best of his knowledge, Defendant has made NO false statements and has not
13 intentionally misrepresented any facts. Defendant has not presented any information or entered
14 any motions or pleadings for improper purpose, nor to harass, cause unnecessary delay, nor
15 needlessly increase the cost of litigation. The exact opposite is in fact the truth. Plaintiff has
16 done each of these things while Defendant has sought to end this matter as quickly and with as
17 little disruption and wasted resources as possible. For the above stated reasons, Plaintiff's
18 motion for rule 11 sanctions should be denied, and Defendant Goodman humbly requests that the
19 court consider sanctions against Plaintiff and Counsel Biss as the evidence presented in this
20 pleading speaks for the facts of this matter.
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EXHIBIT A

Transcript of phone interview with General William Kernan

1

00:00:00,030 --> 00:00:06,060

morning general Kernan can you hear me alright? I can yeah okay thank you

2

00:00:06,060 --> 00:00:14,969

for speaking with me yeah no problem there's a slight delay what I've

3

00:00:14,969 --> 00:00:23,519

basically got a hole in my spinal cord from parachuting and it puts blood on my

4

00:00:23,519 --> 00:00:32,820

brain and is basically robbing my my hearing but have trouble fixing this

5

00:00:32,820 --> 00:00:38,600

thing so you just have to bear with me here I'm very sorry to hear that

6

00:00:41,510 --> 00:00:45,210

well just something I got to deal with yeah

7

00:00:45,210 --> 00:00:50,789

before we begin sir do I have your permission to record the call so I can

8

00:00:50,789 --> 00:00:55,620

make a transcript that will be used as evidence in this lawsuit against me

9

00:00:55,620 --> 00:00:58,340

coming from Robert David Steele

10

00:00:58,340 --> 00:01:01,720

Yeah sure no problem

11

00:01:01,720 --> 00:01:05,060

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 16

1 okay

2 have you had an opportunity to review 12

3 00:01:05,180 --> 00:01:10,320

4 this document background information on Robert David Steele and the other people

5 13

6 00:01:10,320 --> 00:01:18,689

7 were going to talk about yeah I did review what you sent me today had an

8 14

9 00:01:18,689 --> 00:01:29,090

10 opportunity to to look through it little convoluted here is what appears to be a

11 15

12 00:01:29,090 --> 00:01:35,880

13 real screwy situation with this guy you know yeah so you don't recognize this

14 16

15 00:01:35,880 --> 00:01:40,020

16 individual you never worked with him in the development of the NATO open-source

17 17

18 00:01:40,020 --> 00:01:47,520

19 intelligence handbook as he claims

20 I do not know this guy as far as I know

21 18

22 00:01:47,520 --> 00:01:54,500

23 I may have run across him but I do not know Steele or any of the other people

24 19

25 00:01:54,509 --> 00:02:00,080

26 that that you sent me information on right but of course in the book the NATO

27 20

28 00:02:00,090 --> 00:02:04,680

open-source intelligence handbook you reference this open source solutions

21 21

22 00:02:04,680 --> 00:02:09,680

23 company as a contributor is that correct?

24 22

25 00:02:09,680 --> 00:02:20,760

26 the the pamphlet that that was done by SACLANT was a collaborative effort by

27 DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 17

1 23

2
3 00:02:20,770 --> 00:02:30,390
4 the the SACLANT staff which of course was a multinational staff that was done

5 24

6 00:02:30,390 --> 00:02:41,560
7 for the the joint and multinational command that that I commanded of course

8 25

9 00:02:41,560 --> 00:02:47,620
10 I put the forward on it I was asked if I wrote that I did not it was a

11 26

12 00:02:47,620 --> 00:02:55,240
13 collaborative effort by by the SACLANT staff right and in this paragraph

14 27

15 00:02:55,240 --> 00:03:01,540
16 in your forward you say this publication has benefited greatly from the continued

17 28

18 00:03:01,540 --> 00:03:07,810
19 collaboration between my staff and the staff of open source solutions inc I

20 29

21 00:03:07,810 --> 00:03:12,880
22 think this is the main source of disagreement between Robert David Steele

23 30

24 00:03:12,960 --> 00:03:20,260
25 and the reporting that we've done he claims that he is somehow part of open

26 31

27 00:03:20,260 --> 00:03:28,520
28 source solutions but I'm unable to find
any information online to corroborate what he says

32

33 00:03:30,720 --> 00:03:38,860
well I know nothing about Steele having anything to do with writing this and I

34 33

35 00:03:38,860 --> 00:03:47,010
36 saw where he claimed that he wrote 85% of this I find that very hard to believe
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1 34

2
3 00:03:47,010 --> 00:03:53,680

4 unquestionably we do use contractors from time to time but given the type of

5 35

6 00:03:53,680 --> 00:03:58,720

7 document of course I'm going back eighteen years now but given the type of

8 36

9 00:03:58,720 --> 00:04:04,600

10 document that that was we would have used the subject matter experts from the

11 37

12 00:04:04,600 --> 00:04:09,580

13 SACLANT staff to put that document together so the notion that one

14 38

15 00:04:09,580 --> 00:04:14,680

16 individual would have written 85% of it is not compatible with what you're

17 39

18 00:04:14,680 --> 00:04:17,380

19 describing right?

20 40

21 00:04:17,460 --> 00:04:24,160

22 oh no

23 I find it highly unlikely that one

24 41

25 00:04:24,360 --> 00:04:31,000

26 person could have written that it is too complex a document for one individual to

27 42

28 00:04:31,000 --> 00:04:35,120

have written that too many different disciplines and things like that this is

43

00:04:35,220 --> 00:04:39,300

a document over 50 pages

44

00:04:39,300 --> 00:04:42,060

I'm sorry say that again

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 19

1 45

2 00:04:42,060 --> 00:04:44,600

3 it's a it's a lengthy document over 50 pages and I

4 46

5 00:04:44,720 --> 00:04:49,759

6 presume it covers too many different subjects for one person to have written

7 47

8 00:04:49,759 --> 00:04:55,220

9 the whole thing that's correct

10 this would have been this would have

11 48

12 00:04:55,220 --> 00:05:02,330

13 been done by various people within the staff that had staff expertise in the

14 49

15 00:05:02,330 --> 00:05:08,660

16 various areas of that of that document it was like I said it would have been a

17 50

18 00:05:08,660 --> 00:05:13,460

19 collaborative effort it would have been staffed numerous times within the within

20 51

21 00:05:13,460 --> 00:05:20,160

22 the headquarters and then subsequently approved by the by the chief of staff

23 52

24 00:05:20,160 --> 00:05:27,460

25 before it went to me for final approval mm-hmm and do you recall speaking well

26 53

27 00:05:27,470 --> 00:05:32,060

28 sorry it was an email communication with this person who presented herself as Pat

54

00:05:32,060 --> 00:05:39,260

Ingraham who I believe is Susan Lutzke you remember that email exchange right?

55

00:05:39,280 --> 00:05:47,380

Yeah, I just vaguely remember that that conversation or email

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 20

1 56

2 00:05:47,380 --> 00:05:52,340

3 I don't recall whether it was a

4 telephone conversation or an email but I

5 57

6 00:05:52,340 --> 00:05:58,130

7 was basically asked if if I wrote that and I think I told her or the same thing

8 58

9 00:05:58,130 --> 00:06:06,500

10 that all I did was put the forward on it that this was a staff effort by by

11 59

12 00:06:06,500 --> 00:06:10,460

13 SACLANT yeah

14 separately I've been in touch with Susan

15 60

16 00:06:10,460 --> 00:06:14,820

17 Lutzke she's shared the email between you and

18 61

19 00:06:14,820 --> 00:06:19,460

20 her that's how I got your email address that's how you and I got in touch for

21 62

22 00:06:19,460 --> 00:06:23,020

23 this phone call so I believe she was deceiving you there and I'm not sure

24 63

25 00:06:23,020 --> 00:06:28,180

26 exactly what her purpose was but she is not Pat Ingraham

27 64

28 00:06:29,160 --> 00:06:33,520

Yeah I was very surprised

65

00:06:33,620 --> 00:06:42,620

when I got that that request from her these documents these manuals and staff

66

00:06:42,620 --> 00:06:51,080

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 21

1 documents are always done as a collaborative effort by the staff you

2 67

3 00:06:51,080 --> 00:06:58,099

4 know as a commander I might sign off on it to bring attention to the fact that

5 68

6 00:06:58,099 --> 00:07:04,580

7 this is an important document and approved at at the headquarters level

8 69

9 00:07:04,580 --> 00:07:13,130

10 but obviously it's not something that that me as the commander wrote right and

11 70

12 00:07:13,130 --> 00:07:17,900

13 would you have directly interfaced with individuals who did write it or you're

14 71

15 00:07:17,900 --> 00:07:21,820

16 just sort of overseeing it as a project?

17 72

18 00:07:22,380 --> 00:07:33,560

19 right okay hang on just a minute my phone that captures your voice

20 73

21 00:07:33,560 --> 00:07:42,340

22 message is being delayed but... I can rephrase I don't know why this

23 74

24 00:07:42,340 --> 00:07:50,500

25 individual would would indicate that he wrote this because these these type

26 75

27 00:07:50,500 --> 00:07:58,140

28 manuals are always something that that is done at a staff level I see I see

76

00:07:58,160 --> 00:08:04,510

and the third individual David George Sweigert retired US Air Force and

77

00:08:04,510 --> 00:08:09,900

contract employee of various agencies have you ever seen this guy before?

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 22

1 78

2 00:08:11,060 --> 00:08:14,740

3 I don't know this individual at all

4 79

5 00:08:14,780 --> 00:08:21,100

6 yeah I mean I you know you've got good pictures on him and everything else

7 80

8 00:08:21,100 --> 00:08:29,150

9 obviously somebody that also was a defense contractor from time to time he

10 81

11 00:08:29,150 --> 00:08:33,560

12 could have been in the headquarters but I never I never recalled meeting him or

13 82

14 00:08:33,560 --> 00:08:40,920

15 seeing him

16 could've he had a a periodic contract

17 83

18 00:08:40,920 --> 00:08:45,660

19 at Booz Allen Hamilton or somebody like that working in the headquarters yes but

20 84

21 00:08:45,660 --> 00:08:50,130

22 I don't I don't remember ever meeting him of course I'm just trying to

23 85

24 00:08:50,130 --> 00:08:54,300

25 determine why these individuals would have selected this book I mean they're

26 86

27 00:08:54,300 --> 00:09:01,019

28 so persistent in their efforts to stop me from reporting on things their

29 87

30 00:09:01,019 --> 00:09:06,600

31 explanation of simply not liking my news program can't possibly be the real

32 88

33 00:09:06,600 --> 00:09:11,550

34 explanation for their multiple lawsuits they've brought against me and constant

1 89

00:09:11,560 --> 00:09:15,020

2 harassment and defamation

3 so listen General thank you very much

4 90

5 00:09:15,020 --> 00:09:18,320

6 for your time I think that's really all I needed to ask you I really appreciate

7 91

8 00:09:18,320 --> 00:09:25,320

you sharing that information with me and I hope you feel alright and can get

9 92

10 00:09:25,320 --> 00:09:28,000

11 some treatment for this condition

12 93

13 00:09:28,900 --> 00:09:32,380

yes it's always upsetting when

14 94

15 00:09:32,380 --> 00:09:38,000

16 people take credit for other people's work why somebody unless they're just

17 95

18 00:09:38,000 --> 00:09:46,860

trying to fatten their resume by taking credit for something like this is beyond

19 96

20 00:09:46,860 --> 00:09:52,290

21 me why somebody would try to take this credit but it's this is obviously a

22 97

23 00:09:52,290 --> 00:10:00,860

staff document that was worked for months and approved by a multinational

24 98

25 00:10:00,860 --> 00:10:10,380

headquarters so I it's just absolutely beyond a doubt something that the

26 99

27 00:10:10,380 --> 00:10:15,920

28 headquarters put together are not one

individual I understand it's too complicated a document

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 24

1 100

2 00:10:15,920 --> 00:10:20,880

3 yeah one last question with regard to the lawyer representing mr. Steele this

4 101

5 00:10:20,880 --> 00:10:25,680

6 Steven s Biss as I mentioned in the document I have reason to believe that

7 102

8 00:10:25,680 --> 00:10:30,750

9 Robert David Steele has put Biss in touch with the House Intelligence

10 103

11 00:10:30,750 --> 00:10:36,320

12 Committee ranking member Devon Nunez and has encouraged Nunez to bring a lawsuit

13 104

14 00:10:36,320 --> 00:10:42,880

15 against the software company social media giant Twitter and various

16 105

17 00:10:42,880 --> 00:10:49,180

18 co-defendants I have reason to suspect Biss is in a regular practice of

19 106

20 00:10:49,190 --> 00:10:53,380

21 engaging in these fraudulent lawsuits and I'm speculating when I say this but

22 107

23 00:10:53,390 --> 00:10:58,580

24 I believe they're targeting mr. Nunez in an effort to damage his reputation

25 108

26 00:10:58,580 --> 00:11:04,130

27 because I've read their lawsuit and it has virtually no hope of succeeding it

28 109

00:11:04,130 --> 00:11:10,700

has already served to basically be the source of ridicule for mr. Nunez who of

110

00:11:10,700 --> 00:11:15,680

course was closely associated with championing president Trump's claims of

111

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 25

1 00:11:15,680 --> 00:11:20,120

2 innocence during the time that the Robert Mueller investigation was going on

3 112

4 00:11:20,120 --> 00:11:24,280

5 do you have any advice as to what i might be able to do to alert mr. Nunez

6 113

7 00:11:24,280 --> 00:11:29,240

8 I've tried contacting his office and no success

9 114

10 00:11:29,520 --> 00:11:31,900

11 that's very disappointing

12 115

13 00:11:32,800 --> 00:11:34,060

14 Yeah

15 116

16 00:11:36,240 --> 00:11:41,320

17 any any advice as to what I might be able to do do you have any contacts who

18 117

19 00:11:41,320 --> 00:11:47,360

20 could possibly raise an alert to mr.

21 Nunez as to the activities of these individuals?

22 118

23 00:11:48,200 --> 00:11:54,660

24 I don't the only thing that

25 I could possibly suggest that there

26 119

27 00:11:54,660 --> 00:12:02,960

28 there may be still a staff trail within SACLANT headquarters of the staffing

120

00:12:02,960 --> 00:12:08,030

of that document even though it's 18 years ago there still could be in the

121

00:12:08,030 --> 00:12:13,700

files you know those things are pretty heavily staffed within the headquarters

1 122

00:12:13,700 --> 00:12:21,290

2 and there may be something still in the files and in SACLANT the staffing of

3 123

4 00:12:21,290 --> 00:12:26,680

5 that document even though it was 18 years ago to show how that thing was

6 124

00:12:26,690 --> 00:12:34,460

7 ultimately approved well yeah I don't know that it would be necessary to go to

8 125

9 00:12:34,460 --> 00:12:40,100

10 those lengths I think your statements here definitely serve to counteract

11 126

00:12:40,100 --> 00:12:45,080

12 Robert David Steele's ridiculous claims and I definitely appreciate your time

13 127

14 00:12:45,080 --> 00:12:48,480

this morning general thank you very much

15 128

16 00:12:48,820 --> 00:12:53,280

17 yeah I mean it is a ridiculous claim but

18 129

19 00:12:53,580 --> 00:12:59,920

but if he's trying to take credit for it and and

20 130

21 00:12:59,930 --> 00:13:06,710

22 trying to use that as the defamation of character against you I mean it may be

23 131

00:13:06,710 --> 00:13:11,300

24 another another outlet for you yeah all right well I appreciate that I will

25 132

26 00:13:11,300 --> 00:13:15,000

follow up thank you very much sir have a good morning

27 133

28 00:13:15,000 --> 00:13:17,340

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 27

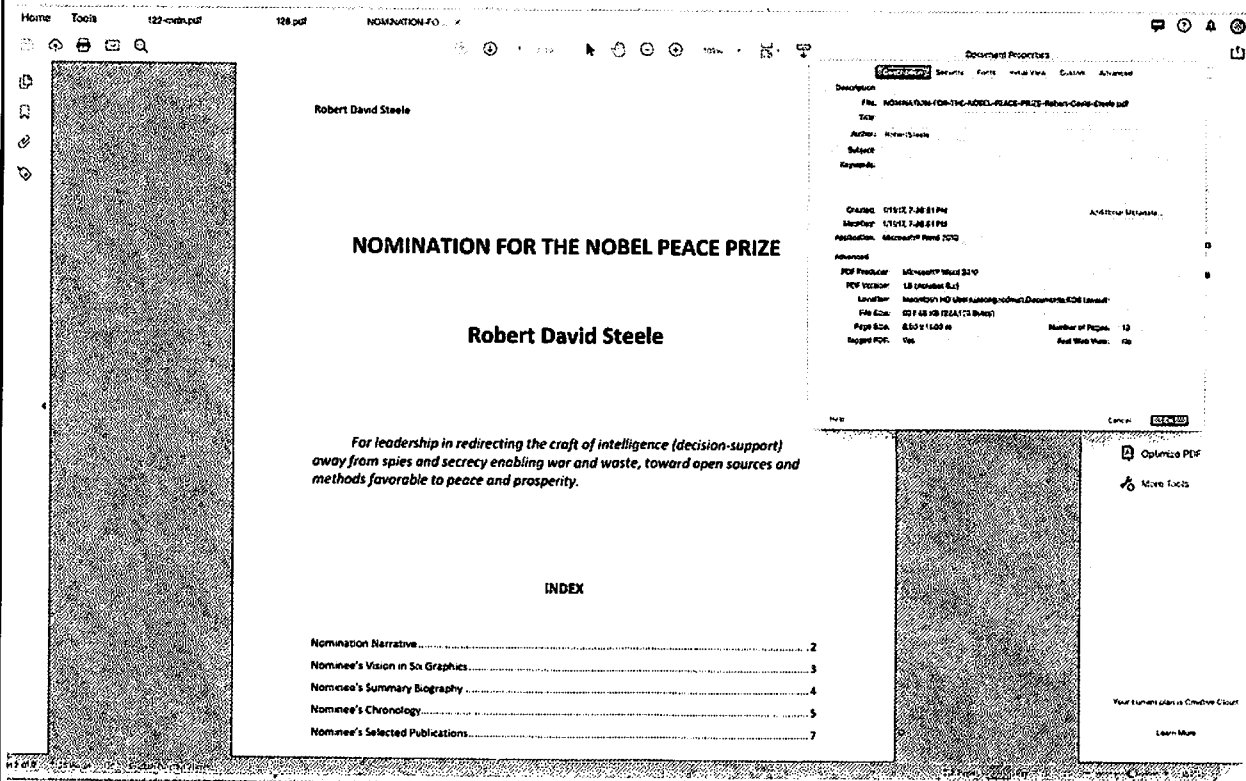
1 okay Jason good luck to you

2 134

3 00:13:17,340 --> 00:13:19,860

4 take care

EXHIBIT B



L PEACE PRIZE

ele

EXHIBIT C

From: Defango TV <defango@gmail.com>
 Subject: Fwd: HAZMAT
 Date: June 18, 2019 at 11:41 AM
 To: truth@crowdsourcethetruth.org, dseaman@gmail.com

----- Forwarded message -----

From: Robert Steele <robert.david.steele.vivas@gmail.com>
 Date: Fri, Jun 30, 2017 at 9:53 PM
 Subject: Re: HAZMAT
 To: amethetanya <atanya1111@gmail.com>, Th Stg <tstger13@gmail.com>
 Cc: Defango <Defango@gmail.com>

Manny, BEFORE the interview, give me a list of eleven truth tellers. I will name them online as credible sources with you being the top one.

On Fri, Jun 30, 2017 at 9:47 PM, amethetanya <atanya1111@gmail.com> wrote:
 mango,

you are a very articulate voice of reason and the fact you live half your life on camera, makes it almost impossible for anyone to lie about you. It is hard to distinguish who is a lunatic and who is a paid who is an attention whore etc... the most prolific source of disinfo is media matters, the david brock, lyn rotheschild pipeline of horse shit. Davids seaman knows a lot about this.

I think manny, you have a much better idea as to who is an authentic/ genuine than I do. I bought into the david seaman is phony but realized in his interview with you, that I was totally off base.

I would give the following people as the people I firmly believe are using their own judgement but I do want to say. I am wrong a lot. BESIDES MANNY my newscasters would be:

H. A Goodman
 davidT (coffee with dave)

MLordandGod

victurus libertas

William mount

davidseaman

Robert wants 12 good people, these are simply the ones I watch, I think manny is in a far better position to determine who those leaders of the community are. that's my viewer preferences. manny is a part of the community, is getting attacked and knows these people and has outside contact with them, I am simply an observer.

It would be cool if you took regular scheduled time to let people submit accounts they suspect to be disinfo, if they are not they can call in and discuss the accusations but go over all the available fact, and let the viewer decide HUMAN or HAZMAT

Normal people do not attack people saying things like 'Defango is a bad bad person, I am concerned what he might do to me or my family' that is just not normal. Its also not legal.

because of the medium we have no means to stick a 'CONTAMINATED MATERIALS' label on people.

'until we finish our open source information platform we still have to try to distinguish who is honest

what evidence is presented
 appeals to emotions vs intellect?
 attacks others?

is angered by opposition?

grandiose conclusions... is this 'a huge step for the crowdsourcse community'?

Will not rationally respond to information, when facts are brought up, they will be shout, demean mock but never ever address scripted story lines/comments

professional production videos (aka morphonius)

entertainment industry connections

attacking discrediting others

no person who watches 'WHO SPOOFED THE SETH RICH FILES' believes him to be authentic. it would be easier to create a new platform that excludes all the rigged data commercials than to separate who is and who is not crazy or paid to be wrong. we all know they are toxic but we cant get rid of them.

it has become 'FW tube' we need a NEWTUBE. You cant go back and undo a life, right now they don't have a worry in the

...the second... we need a... You can go back and... right now they are more... in the world, they do that for living. a lawsuit would create more diarrhea. at least slow the 10 posts a day. a suit against each person who lies about others and the repeaters= the proceeds would fund the new thing with the proceeds. each fake actor will have to hire their own legal team, pay 20k per person, where they get the money to pay their lawyers will come out in discovery= it's a trap!

WHAT TO DO TO SCARE THEM:

"anyone being harassed and stalked for speaking the truth should send a detailed account of who is cyber harassing you to unrig? legal. if we get enough people and the right set of facts you will be included in the lawsuits we intend to file to expose this happening. put 'crowdstalked' in subject line" I can deal with that and write cases and get them filed if needed. this will really hurt them. Also strongly imply that a new youtube is being created in secret. that will drive them nuts.

WHAT PEOPLE CAN DO TO NOT BE PART OF THE PROBLEM

research. books. collect information without deciding right away and being sure. collect a lot of information. If you talk about pizzagate, point to the people before you, point out the mountains of evidence that already exists. do not repeat an internet rumor. do not decide what is true and false based on the words of another alone. trust your gut feeling that you are being lied to but don't accuse people of things with no evidence.

people are worried about George webb so they don't hear about ted gunderson paul bonacci, caradori. This is being done on a scale that makes hitler look like a novice. hundreds of children go missing from DC each month. make sure they know people have not forgotten what they are working so hard to distract us from.

Tanya
443.875.6091

--
#UNRIG: <http://tinyurl.com/IndieGoGo-UNRIG>
Personal Page: <http://robertdavidsteele.com>
Group Blog: <http://phibetiaota.net>
Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
Defango@gmail.com

EXHIBIT D

From: Defango TV <defango@gmail.com>
 Subject: Fwd: Apology again without caveats
 Date: June 18, 2019 at 11:41 AM
 To: truth@crowdsourcethetruth.org, cseaman@gmail.com

----- Forwarded message -----

From: Robert Steele <robert.david.steele.vivas@gmail.com>
 Date: Mon, Dec 4, 2017 at 6:28 PM
 Subject: Re: Apology again without caveats
 To: Defango <defango@gmail.com>

should I ask Tyroan for the access information? Steve asked me not to contact him. what's the least troubling way to "take possession" of the channel? direct from Tyroan?

On Mon, Dec 4, 2017 at 6:27 PM, Defango <defango@gmail.com> wrote:

In the Last month I have generated over 1k in bitcoin posting my content on steemit regularly and using the platform. I have a small channel on steemit with only the posts I have. IF you started just copy and pasting your content over to steemit and kept active you could be doing 3 times that with little to no problem. Steemit just a new platform that people are using for good and it doesn't matter if they are old articles of yours, they still will generate incoming on the platform. its the decentralized platform that your looking for, it has all the things it needed to fully design and use any open source systems. They just need to be created and connected

On Mon, Dec 4, 2017 at 4:11 PM, Robert Steele <robert.david.steele.vivas@gmail.com> wrote:
 PLEASE calm Tanya for me. You can tell here I am your bitch now (smile)

On Mon, Dec 4, 2017 at 6:00 PM, Defango <defango@gmail.com> wrote:
 Thanks A Lot.

I was not my intention to hurt you, but I just wanted to clear the air for many people and it seems we had good stopping point

Bless you for all you have done and I know things are going to be better in the future. Take some time and collect yourself because January is going to be a very busy time for all of us.

The video should be edited down and I will keep myself quite on the subject until it seems like it's safe to talk about it. I'm just going all in on deflecting any negative comments from Goodman's crowd. He fell for a trap I set for him and it's not looking good for him.

You just need to start posting on steemit. Sure month one will be nothing, but if you spend the next month moving over content from your website. I can be honest and saying you could be generating over 7k a month and crypto.

On Mon, Dec 4, 2017 at 10:56 AM, Robert Steele <robert.david.steele.vivas@gmail.com> wrote:
 Bless you. I fucked up and it was not at all my intention to be insulting to you. Absolutely NOT

I will do whatever you wish including if you direct me, posting an apology with no caveats at the video (which you can leave up or not as you please) and doing a future live stream or not. I am about to disappear from public view for 30 days, from Saturday.

I will not mention the video again. If asked by another host about it I will say I screwed up and have apologized to you three times, profusely, I was completely in the wrong in how I spoke. Count on me to be honorable with you.

Also, Trevor just reminded me that I had offered you the bus ride, and that is absolutely still yours if you wish. I am waiting on Cynthia to decide about coming back to the USA. I will do an email now cc you that puts this back on the table with her.

On Steemit, I will follow your lead and do whatever you tell me to do.

My heart is lighter for re-connecting with you. It was NEVER my intent to disrespect you or your channel, I was stupid and clumsy.

Robert

On Mon, Dec 4, 2017 at 12:39 PM, Defango <defango@gmail.com> wrote:
 I accept the apology. We will figure what do next

On Dec 4, 2017 6:18 AM, "Robert Steele" <robert.david.steele.vivas@gmail.com> wrote:
 Manru

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remedy.

I apologize again, with no caveats. What can I do to make it right? Will hope to hear from you.

Both Steve and Cynthia are united with you and hold me accountable for being completely wrong in this past encounter.

Very respectfully,
Robert

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#UNRIG Donate: <http://tinyurl.com/IndieGoGo-UNRIG>
Personal Page: <http://robertdavidsteele.com>
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Defango@gmail.com



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Group Blog: <http://phibetiaota.net>
Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
Defango@gmail.com

EXHIBIT E

From: Defango TV defango@gmail.com
 Subject: Fwd: sorry!
 Date: June 18, 2019 at 11:44 AM
 To: truth@crowdsourcethetruth.org, dseaman@gmail.com



----- Forwarded message -----
 From: amethetanya <atanya1111@gmail.com>
 Date: Sun, Jul 2, 2017 at 8:49 AM
 Subject: sorry!
 To: Defango <Defango@gmail.com>

So I love Robert but he moves way to fast. I was just having lunch and talking about how viewers discern things and why you are the best one basically (let's face facts you are a good 50 IQ points > rest) I'm slammed busy with life as I'm sure you are but also with kids and a husband (that's like 3 kids) so if him deciding TOMORROW was a pain in your butt I do apologize.

I'm sitting here writing defamation cases for my husband for policemen and thinking I can in three days get you a case against Jason. I'm guessing a half a million bucks they will throw at you to just make it go away = catch it! Robert is the real deal he can go to court for you. And will. that is cool thing about him. He drove 3 hours to come see me on the farm (terrified honestly) and hung out all day, seemingly unaffected my friends showing up and doing bong hits.

I had written the most killer case against Jake-crisis-actor-morphonius. I will have Nora (maccoby) send you a copy (I cant). They called her dad a child trafficker, while her whole family is in the hospital (her mom is dying) her brother is a lawyer who repped afeantis against david brock in their "divorce" but apparently HE blackmailed BROCK and is NOT a pedo??? just a fudge packer. NOT THAT THERE'S ANYTHING WRONG WITH THAT***.

Max, her brother was the one who eventually would not let her file against morphonius because his corporate overlords didn't want the publicity. the lawsuit he is waving around on his channel, I wrote that. Nora had started trying to help Robert get to trump because she lives like a few doors down from Pense's guards (I call them spear holders because he is a notorious fag) when her family came under intense fire from media matters. THE ONLY person who knew the stuff in the highly produced morphonius pieces was brock. anyways then she got in a huge fight with Robert over the pedo thing, the details of which escape me. So I was a little wary with helping Robert because I think the attack against her family was because they were trying to help him. and I still want to go after media matters, get them off youtube and get the victims of the slander paid.

anyways do contemplate suing Jason, he's likely insured. You have a great case.

TT

***totally is lots wrong with it. poop on the sheets for instance.

Defango@gmail.com


DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 36

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 37

EXHIBIT H

●●○○○ AT&T LTE

2:23 PM

57% 2 Messages
Your July 3rd TourFound in All Mail Mailbox **Robert Steele**

7/7/17

To: George Webb

Details



George, for information. A massive law suit is about to be filed against Jason Goodman by a lawyer who specializes in defamation cases. Manny is the one who will be in front, my case will simply be in support. Jason is buried so deep by his own words that we expect Google to shut him down completely -- close his channel and delete all of his videos. Since the videos appear in all states this will be a multi-state filing, done pro



Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Networ

Jason Goodman

Name

Name

11005 LANGTON ARMS CT

252 7th avenue

6s

VS.

Street Address

Apt. #

Street Address

Apt. #

OAKTON, VA 22124 (571) 320-8573

New York NY 10001 (323) 744-7594

City State Zip Code Area Telephone
Code

City State Zip Code Area Telephone
Code

Plaintiff

Defendant

CERTIFICATE OF SERVICE

(DOMREL58)

I HEREBY CERTIFY that on this 26 day of June, 2019, a copy
of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

Title of Document(s)

was/were mailed, postage prepaid to:

Susan Lutzke Holmes

Opposing Party or His/Her Attorney

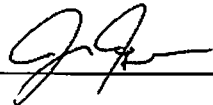
2608 Leisure Dr Unit B

Address

City State Zip
Fort Collins CO 80525

June 26, 2019
Date

Signature



Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Networ

Name

11005 LANGTON ARMS CT

Street Address

OAKTON, VA 22124 (571) 320-8573

City State Zip Code Area Telephone
Code

Plaintiff

VS.

Jason Goodman

Name

252 7th avenue

Street Address

New York NY 10001 (323) 744-7594

City State Zip Code Area Telephone
Code

Defendant

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(DOMREL58)

I HEREBY CERTIFY that on this 26 day of June, 2019, a copy
of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

Title of Document(s)
was/were mailed, postage prepaid to:

Steven S Biss

Opposing Party or His/Her Attorney

300 West Main Street Suite 102

Address

Charlottesville VA 22903

City State Zip

June 26, 2019
Date


Signature

Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Networ

Name

11005 LANGTON ARMS CT

Street Address

OAKTON, VA 22124 (571) 320-8573

City State Zip Code Area Telephone
Code

Plaintiff

VS.

Jason Goodman

Name

252 7th avenue

Street Address

New York NY 10001 (323) 744-7594

City State Zip Code Area Telephone
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Defendant

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Title of Document(s)
was/were mailed, postage prepaid to:

D. George Sweigert

Opposing Party or His/Her Attorney

PO Box 152

Address

Mesa AZ 85211

City State Zip

June 26, 2019
Date


Signature

Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

Robert David Steele and Earth Intelligence Networ
City or County

Name
11005 LANGTON ARMS CT
Street Address
OAKTON, VA 22124 (571) 320-8573
City State Zip Code Area Code Telephone
Plaintiff

VS.

Jason Goodman
Name
252 7th avenue
Street Address
New York NY 10001 (323) 744-7594
City State Zip Code Area Code Telephone
Defendant

CERTIFICATE OF SERVICE
(DOMREL58)

I HEREBY CERTIFY that on this 26 day of June, 2019, a copy
of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

Title of Document(s)
was/were mailed, postage prepaid to:

Terry Frank Kaufman & Canoles
Opposing Party or His/Her Attorney
1021 E. Cary Street, 14th Floor
Address
Richmond VA 23219
City State Zip

June 26, 2019
Date

[Signature]
Signature

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

JASON GOODMAN, et al.,

Defendant(s).

Civil Action Number: 3:17-cv-00601-MHL

LOCAL RULE 83.1(M) CERTIFICATION

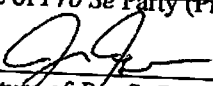
I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of _____

**DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION FOR RULE
11 SANCTIONS**

JASON GOODMAN

~~Name of *Pro Se* Party (Print or Type)~~


Signature of *Pro Se* Party

Executed on: June 26 2019 _____ (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____
(Name of Attorney) (Title of Document)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)